

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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Cristal Hernandez,  
Plaintiff,

CASE NO. 13-CV-366-RTR

v.

La Fuente Ltd., *et al.*  
Defendants.

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PETITION FOR ATTORNEYS' FEES AND COSTS

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NOW COME Plaintiffs, by and through their attorneys, Hawks Quindel, S.C., to respectfully petition the Court for an award of costs and attorneys' fees as set forth below and on those grounds set forth in Plaintiffs' supporting brief and the accompanying declarations of Attorneys Larry Johnson, Brenda Lewison, Janet L. Heins, and James Walcheske.

1. Class Counsel has negotiated a settlement of this FLSA collective action and Rule 23 class action on behalf of a class of 106 current and former employees of La Fuente;

2. The settlement creates a common fund of \$235,000. Plaintiff petitions the Court for a recovery of attorneys' fees of \$78,333.33, equal to 33.33% of the settlement fund. Plaintiff also petitions the Court for a recovery of costs of \$17,615.51, for a total of \$95,948.84.

3. As set forth in greater detail in Plaintiff's supporting brief, the requested awards are reasonable and consistent with the market rate in similar cases.

WHEREFORE, Plaintiff respectfully requests that the Court award costs and attorneys' fees as set forth above.

Respectfully submitted this 24th day of September, 2014.

Respectfully submitted,

**s/Larry A. Johnson**

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